

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JAMES KARNES and	:	CHAPTER 13
LORRIE KARNES	:	
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
JAMES KARNES and	:	
LORRIE KARNES	:	
Respondent(s)	:	CASE NO. 5-20-bk-02523

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 28th day of September, 2020, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor(s)' disposable income is greater than that which is committed to the plan based upon disposable income on Schedules I and J and specifically disputes the following amounts:

a. Homes maintenance – Line 4c; oil heat – Lines 6d and vehicle insurance – Line 15c.

2. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

a. Secured claims not in plan. (timeshares)

3. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:

a. 2019 Federal Income Tax return. (or statement)

4. The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:

a. Clarification of vesting of property. (discharge or closing)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 5th day of October, 2020, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael McCrystal, Esquire  
151 Main Street, Suite A  
Emmaus, PA 18049

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee